

Applicants gratefully acknowledge the Office Action's indication of allowable subject matter in claims 6-11 and 42-47 in related U.S. Patent Application Ser. No. 08/861,438 which are similar to claims 62-67, 76-81, 90-95, and 140-109 in the present application while incorporating elements from claim 15-36 and 51-56. However, for the reasons set forth below, Applicants respectfully assert that all of the claims are directed to allowable subject matter and that the application is in condition for allowance.

Applicants thank Examiner Ngo for the courtesies extended to Applicant's representative during the September 14, 2000 personal interview and the October 23, 2000 telephonic interview for related U.S. Patent Application Serial No. 08/861, 438. During the interviews, the differences between amended claims 1 and 37, now claims 57, 71, 85, and 99, and Jurkevich et al. (U.S. Patent No. 5,164,398) and Fujisaki (U.S. Patent No. 5,903,569) were discussed. Examiner Ngo agreed that the amended claims are not taught or suggested by Jurkevich et al. or Fujisaki, but stated that they would require further consideration or search (as noted in the September 14, 2000 interview summary). The substance of the interview is summarized in the following remarks.

The May 24, 2000 Office Action rejected claims 1-14 and 37-50 under 35 U.S.C. § 102 over Jurkevich et al. (U.S. Patent No. 5,164,938) or Fujisaki (U.S. Patent No. 5,903,569). This rejection is respectfully traversed.

Jurkevich et al. discloses a system that utilizes a composite frame approach for fast packet multimedia that utilizes frame compression and bandwidth seizing (col. 3, lines 3-9). Frames may be compressed to conserve bandwidth rather than employing techniques of contention for available bandwidth (col. 3, lines 20-22). All of the various traffic component

types in the data streams from multiple subscribers are assembled into composite frames configured for transmission to other subscriber through an integrated services network (col. 3, lines 46-50). The system includes assigning of priorities so that voice traffic may be allowed to suffer data loss but no delays, while data packets are permitted to suffer delay but no data loss (col. 4, lines 23-27).

Fujisaki discloses an apparatus for transmitting and receiving a digital signal, where different types of video and audio signals can be transmitted as one bit stream (col. 2, lines 45-48). The apparatus can transmit a signal that constitutes various data portions (col. 2, lines 49-61). The apparatus utilizes an arrangement of a digital signal reception device and a digital signal transmission device that can be combined together (col. 4, lines 48-50). The digital signal transmission and reception device includes a digital signal transmission device (col. 10, lines 25-27).

Neither Jurkevich et al. nor Fujisaki disclose or suggest a topology adaptive tie-line having a plurality of full duplex dedicated router interconnects connected to a first router, the topology adaptive tie-line transmitting at least non-packetized latency free continuous data, as recited in independent claim 57 and similarly recited in independent claim 71. Additionally, neither Jurkevich et al. nor Fujisaki disclose or suggest the topology adaptive tie line transmitting router reconfiguration data multiplexed with latency free continuous data, as recited in claim 85 and similarly recited in claim 99.

Therefore, Applicants respectfully submit that independent claims 57, 71, 85, and 99 define patentable subject matter. Claims 58-70, 72-84, 86-98, and 100-112 depend from independent claims 57, 71, 85, and 99, respectively, and therefore also define patentable subject

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matter. Accordingly, Applicants respectfully request prompt examination and allowance of the pending claims.

Should the Examiner believe that anything further would be desirable in order to place this application in better condition for allowance, the Examiner is invited to contact Applicants' undersigned representative at the telephone number listed below.

Respectfully submitted,



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Dated: February 6, 2001

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